EXHIBIT B

Verizon Florida Inc.'s Supplemental Responses to Covad Communications' Second Set of Interrogatories (Nos. 13-16) Docket Nos. 981834-TP/990321-TP Page 2



INTERROGATORIES

13. If the Commission requires Verizon to offer a non-recurring charge (NRC) to recover its infrastructure cost on a per ampere basis, how much should such a charge be?

Response:

If the Commission were to require Verizon FL to recover its power <u>infrastructure</u> costs (which do not include AC utility costs or maintenance costs) through an NRC, the appropriate rate would be **Sector** per amp. Note that this NRC would <u>not</u> include infrastructure replacement costs, as explained at pages 7-8 in Verizon FL's Response to Motions for Reconsideration, filed in this docket on December 18, 2003.

14. If maintenance costs are in included in the NRC provided in Interrogatory No. 13 above, what portion of the charge is attributable to maintenance?

Response:

Verizon FL's response to Covad Interrogatory No. 13 does not include maintenance costs.

15. If maintenance costs are not included in the NRC provided in Interrogatory No. 13 above, what additional charges would apply if the Commission required the NRC to reflect maintenance?

Response:

Verizon FL cannot provide the information requested in the format requested. Maintenance costs should be recovered as they are incurred — on a monthly recurring basis. The appropriate power infrastructure maintenance monthly recurring charge would be \$ monthly per amp. In addition, Verizon FL would be entitled to recover the costs incurred in emergency generator testing via a monthly recurring charge.

16. Provide all calculations supporting the charges listed in Interrogatory Nos. 13-15 above.

Response:

See Verizon FL's Response to Covad POD Request No. 2.

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State of Florida Covad's Second Request for Production of Documents to Verizon Florida Inc. Docket Nos. 981834-TP/990321-TP Attachment Covad POD 2(a) DC Power

Ln	Cost Elements	Increment	Source	Cost
	(a)	(b)	(c)	(d)
	DC Power			
1	DC Power Infrastructure	per amp	DC Power Fac 1-CS	
Not	e:			

Revised power study.

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State of Florida Covad's Second Request for Production of Documents to Verizon Florida Inc. Docket Nos. 981834-TP/990321-TP Attachment Covad POD 2(a) DC Power Facility

Ln	Description (a)	Source (b)	Power Supply Cost (per 1 amps) (c)
1	Equipment Investment	DC Power Fac 2-CS	· · · · · · · · · · · · · · · · · · ·
2	Engineering & Installation	DC Power Fac 2-CS	, , , ,
3	Total Investment	Ln 1 + Ln 2	

Note:

Revised power study.

Highlighted information is redacted for reasons #1 and #3. Parties may obtain this information by signing a non-disclosure agreement.

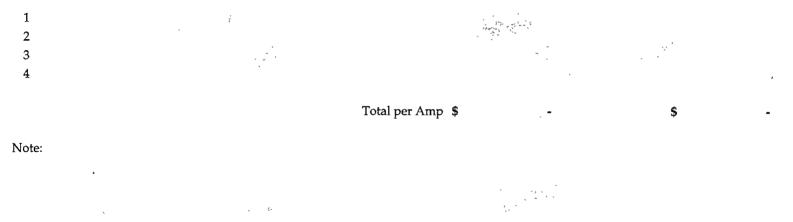
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State of Florida Covad's Second Request for Production of Documents to Verizon Florida Inc. Docket Nos. 981834-TP/990321-TP Attachment Covad POD 2(a) DC Power Facility -- Equipment and Labor Costs

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Description				Power Eq	uipment	Pow	er Labor	
		Amps	·	Power Equipment		Power Labor		
Ln	CO Line Sizes (Note 2) Lin		Line %	Cost	Cost per Amp	Cost	Cost per Amp	
		(a)	(b)	(c)	$(d)=(c)/(a)^{*}(b)$	(e)	(f)=(e)/(a)*(b)	



Highlighted information is redacted for reasons #1 and #3. Parties may obtain this information by signing a non-disclosure agreement.

State of Florida Covad's Second Request for Production of Documents to Verizon Florida Inc. Docket Nos. 951834-TP/990321-TP Attachment Covad POD 2(a) DC Power Facility – Equipment and Labor Costs

							Power E	quipment				-, <u>-</u>	.	Por	wer Installa	tion	
Ln	Power Plant (a)	Line Size (b)	Rectifiers/ Controller {c)	Batteries (d)	Buss Bar (e)			Secondary Distribution Bay (h)	Grounding (i)	Subtotal (J=ci)	Generator (k)	Total Equipment (l=j+k)	Power Installation (m)	Generator Installation (n)	Misc (0)	Supply & Sales Tax	Total Installation (q=mp)
2 3	450 Amp Power Plant Up to: 650 Amp Power Plant Up to: 1300 Amp Power Plant Up to: 1950 Amp Power Plant Up to [.]			1875 - No. 2 - S					5 34 5 5 4 5 7 5 3								
I	<u>Group</u> Plannung (011) P. Network Engineering (011) H COEI (101) Ir Maintenance (211) S Totais	ardware Eng stallation	<u>Labor Rate</u>	Power	Equipment I	Labor and Labo	r Rates		Gener	ator Equipm	ent Labor and 1	abor Rates		,			
Note: Revise	Supply, F ed power study	reight & Sales Ta	Highlighted i	nformation is r is information	redacted for r by signing a	easons #1 and non-disclosure	#3. Parties m agreement.	ay obtain									

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State of Florida Covad's Second Request for Production of Documents to Verizon Florida Inc. Docket Nos. 981834-TP/990321-TP Attachment Covad POD 2(b) DC Power Maintenance Costs

Ln	Cost Elements	Increment	Source	Cost
	(a)	(b)	(c)	(d)
DC Powe	r			
1 DC Power	r Maintenance Costs	per amp	DC Power Maint 1-CS	
				,
2 Contribut	ion Amount		Ln 1 * Fixed Allocator	
3 Total Mor	nthly Recurring Cost			\$ -
			r	
		REDACTE		

Note: Revised power study.

Highlighted information is redacted for reasons #1 and #3. Parties may obtain this information by signing a non-disclosure agreement.

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State of Florida Covad's Second Request for Production of Documents to Verizon Florida Inc. Docket Nos. 981834-TP/990321-TP Attachment Covad POD 2(b) DC Power Facility - Maintenance Costs

		Description	laintenance		
		Amps		Power Maintenance	
Ln	CO Line Sizes	(Note 2)	Line %	Cost	Cost per Amp
		(a)	(b)	(e)	$(f)=(e)/(a)^{*}(b)$



Note:

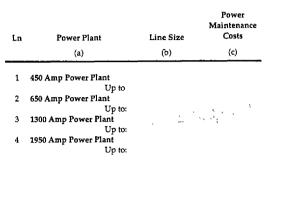
Highlighted information is redacted for reasons #1 and #3. Parties may obtain this information by signing a non-disclosure agreement.

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State of Florida Covad's Second Request for Production of Documents to Venzon Florida Inc. Docket Nos. 981834-TP/990321-TP Attachment Covad POD 2(b) DC Power Facility - Equipment Maintenance Costs



Power Equipment Labor and Labor Rates

 Group
 Function
 Labor Rate

 Planning (011)
 Planning
 Network Engineering (011)
 Hardware Eng

 COEI (101)
 Installation
 Maintenance (211)
 Service Work

 Totals
 Totals
 Totals



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Supply, Freight & Sales Tax

* Revised power study

Highlighted information is redacted for reasons #1 and #3. Parties may obtain this information by signing a non-disclosure agreement.